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May 20, 2025

VIA ELECTRONIC MAIL
SUBMITTED UNDER SEAL

The Honorable Arun Subramanian
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Sean Combs*

24 Cr. 542 (AS)

Dear Judge Subramanian,

This letter is submitted in an abundance of caution on behalf of my client, Jane Doe (hereinafter “Jane Doe”), who has been granted the right to proceed at trial under a pseudonym, and is also identified as “Victim-2” in the above-captioned case. This letter pertains to the Court’s May 20, 2025, Order (Docket No. 342) requiring that email communications from the parties regarding evidentiary and other issues should be docketed by May 27, 2025.

In order to comply with the Court’s Order, assuming it applies to interested parties, such as Ms. Doe, as well as to the prosecution and defense, and in the interest of efficiency, this letter serves as a request to be added to the docket as an interested party in the above-captioned case, such that I may file documents by ECF. At present, this request pertains in particular to my May 14, 2025, letter, submitted to the Court by email, opposing the May 12, 2025, letter of Robert Balin and Alexandra Perloff-Giles requesting on behalf of certain news organizations the ability to view sexually explicit audiovisual trial exhibits that would not be played in open court.

Because my May 14, 2025, letter to the Court also included a request that the letter be

filed under seal, with only a redacted version to be filed publicly, this letter also constitutes an application for leave to file my May 14, 2025, letter by ECF with redactions, as set forth in the proposed redacted version of this letter, attached hereto as Exhibit 1. The purpose of the requested redactions is to avoid revealing sensitive information contained in the letter which could, if stated publicly, frustrate Ms. Doe's ability to remain anonymous and due to the "particularized and unique challenges" the defense and prosecution agree she would face if her identity were revealed. See Docket No. 262; Docket No. 266.

Accordingly, it is respectfully requested that the Court add Ms. Doe to the docket as a interested party in the above-captioned criminal case to allow documents to be filed on her behalf by ECF. It is also respectfully requested that the Court grant Ms. Doe's application for leave to file a redacted version of the May 14, 2025, Letter submitted to the Court by email and under seal, and that the Court approve the proposed redacted version of this letter, submitted as Exhibit 1, in that it is narrowly tailored to preserve Ms. Doe's anonymity, consistent with the Court's April 18, 2025, Order (Docket No. 262), granting the unopposed motion for Ms. Doe to proceed at trial using a pseudonym.

Respectfully Submitted,



Lindsay A. Lewis

LAL/

GRANTED. SO ORDERED.



Arun Subramanian, U.S.D.J.

Date: May 21, 2025